

1 SALMA AGHA-KHAN, M.D.  
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 Plaintiff in Propria Persona

FILED
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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA

ISAF

## UNITED STATES BANKRUPTCY COURT

## EASTERN DISTRICT OF CALIFORNIA, BAKERSFIELD DIVISION

Re: SALMA H. AGHA,  
 an individual,

Plaintiff-Debtor,

**vs.**

The United States of America; FREDRICK CLEMENT, an individual, and Judge of the United States Bankruptcy Court; JEFFREY M. VETTER, an individual, and Trustee of the United States Bankruptcy Court; ] BRUCE BREITMAN an individual, attorney, realtor, broker and Principal at BBG Ltd; BBG Ltd, a corporation; LISA HOLDER, an individual and attorney in KDG; BARRY L. GOLDNER an individual and attorney in Klein DeNatale Goldner; KLEIN DENATALE GOLDNER, a professional law corporation; The Estate of PETER J. ZOURAS for Peter James Zouras an individual and attorney now deceased; LAW OFFICES OF PETER J. ZOURAS, a profession law firm; DAVID N. CHANDLER, an individual and an attorney at David N. Chandler PC; DAVID CHANDLER, an individual and an attorney at David N. Chandler PC; DAVID N. CHANDLER SR, an individual and an attorney at David N. Chandler PC; DAVID N. CHANDLER JR, an individual and an attorney at David N. Chandler PC; DAVID N. CHANDLER PC, a corporation; CITI BANK, a Banking concern; CITI MORTGAGE INC, a Citi Bank Company; WILMINGTON TRUST COMPANY, a Trust Company and subsidiary of Citi Bank; CR TITLE SERVICES INC, a Title Company and subsidiary of Citi Bank; RE MAX HOLDINGS INC, Parent Company of Re Max LLC; RE MAX LLC, real estate corporation franchising Re Max Magic; DEBBIE BANDUCCI an individual, Re Max franchisee, Broker at Re

Case No: 10-16183

Chapter 7

Adv No: 14-01155

## DECLARATION OF SALMA AGHA-KHAN, MD REGARDING HER COMPLAINT FOR

1. BANKRUPTCY FRAUD 18 USC 157;
2. VIOLATION OF 18 USC 152;
3. VIOLATION OF 18 USC 153;
4. VIOLATION OF 18 USC 154;
5. VIOLATION OF 18 USC 155;
6. VIOLATION OF 42 U.S.C. 1981;
7. VIOLATION OF 42 USC 1982;
8. VIOLATION OF 42 USC 1983;
9. VIOLATION OF 42 USC 1985;
10. TRUSTEE'S INTENTIONAL BREECH OF FUDICIARY DUTY
11. VIOLATIONS OF CALIFORNIA HOME OWNER BILL OF RIGHTS
12. VIOLATIONS OF CALIFORNIA BUSINESS AND PROFESSIONS CODE
13. VIOLATIONS OF US AND CALIFORNIA LEGAL STATUTES
14. VIOLATIONS OF AUTOMATIC STAY 11 USC § 362  
(a),(c),(k) BOTH WILFUL AND INTENTIONAL
15. VIOLATIONS OF 42 U.S. Code § 1320d-6 AND CALIFORNIA MEDICAL PRIVACY ACTS
16. PUNITIVE DAMAGES

Judge: HON. W. RICHARD LEE

1 Max and Realtor at Re Max Magic; RE MAX  
2 MAGIC, a real estate franchise of ReMax;  
3 ROBIN TUBESING, an individual and  
attorney in US Trustees Office; BRIAN  
4 GUNN, an individual and Attorney at Wolf &  
Wyman LLP; ANDREW A. BAO, an individual  
and Attorney at Wolfe & Wyman LLP;  
5 HEATHER S. KIM, an individual and Attorney  
at Wolfe & Wyman LLP; WOLFE & WYMAN  
6 LLP a Professional Law Firm; EDDIE R.  
7 JIMENEZ, an individual and Attorney at Pite  
Duncan LLP; BRIAN A. PAINO, an individual  
and Attorney at Pite Duncan LLP; MICHAEL  
8 J. KRAHENBUHL, an individual and attorney  
at Pite Duncan LLP; JUDGE RIAHARD LEE,  
9 an individual and Judge of the United States  
Bankruptcy Court; PITE DUNCAN LLP,  
10 DIXON KUMMER, an individual and sub-  
contractor for Pite Duncan LLP; GATTUSO &  
11 KUMMER LAW FIRM, a professional law firm  
and a sub-contractor for Pite-Duncan LLP;  
12 RICHARD VINCENT MONAHAN, an individual  
and sub-contractor for Pite Duncan LLP;  
13 TERRY CARLSON, an individual and principal  
at Terry Carlson Law; TERRY CARLSON  
14 LAW, a Professional Law Firm; GARY  
15 GROSSMAN, an individual and principal at  
Lerer Brothers Inc; BOB GROSSMAN, an  
individual and principal at Lerer Brothers  
16 Inc; LERER BROTHERS INC., a California  
Corporation; ROBERT ALLEN GROSSMAN,  
17 an individual and principal at Lerer Brothers  
Inc; AUGUST B. LANDIS, an individual and  
Acting US Trustee; MARK L. POPE, an  
18 individual and Assistant US Trustee;  
GREGORY S. POWELL, an individual and  
19 attorney for US Trustee; CONNIE M.  
PARKER, an individual and attorney at KDG  
20 Law firm; DAVID J. COOPER, an individual  
and attorney at KDG Law Firm; JOHN  
21 THOMAS DZIALO, an individual, attorney  
and Principal at John Thomas Dzialo law  
firm; LAW OFFICES OF JOHN THOMAS  
22 DZIALO, a professional law firm; STUART F.  
SPENCER, an individual and Consultant at  
Dzialo law office; SCOTT HAYWARD an  
23 individual and attorney at Dzialo law office;  
24  
25

JODIE GOODMAN, an individual and Senior Vice President Mother Lode Holding Company and Placer Tile Company; PLACER TITLE COMPANY, a title company of Mother Lode Holding Company; PATRICIA LAFFIN-MIKO, an individual and legal advisor for Placer Title Company and Mother Lode Holding Company; THERESA ROBERTS, an individual and legal advisor for Placer Title Company and Mother Lode Holding Company; MOTHER LODE HOLDING COMPANY, parent company for Placer Title Company; SYED SAGHIR, an individual, a Defendant and minor share-holder in Vodka From Around the World LLC litigation in Orange County; CANDICE DAVIS, an individual, a Defendant and prior Manager of Vodka From Around the World LLC's business litigation in Orange County; JASON SADURAL, an individual, and prior employee of Vodka From Around the World LLC; ANTONIA G. DARLING, an individual and Assistant US Trustee; and Does 1 through 100 inclusive

## **Defendants**

**PLEASE NOTE:** The **DUTY TO REPORT MISCONDUCT** to the appropriate governing authorities is an ethical duty imposed on Judges, Attorneys etc in the United States by the rules governing professional responsibility. Acts constituting Misconduct which include tampering with evidence, suborning perjury and committing criminal acts of violence or dishonesty. Failure to report such crimes can result in disbarment, sanctions, impeachment etc

1                   **DECLARATION OF SALMA AGHA-KHAN, MD.**

2 I, SALMA AGHA-KHAN, MD., declare as follows:

3                   My legal birth name is Salma H. Agha which I changed following my  
4 marriage to Salma H. Khan. Following my divorce in 2003 I assumed my legal  
5 maiden name Salma H. Agha, however due to difficulties with changing the  
6 name on professional documents I had to hyphenate my last name as Agha-  
7 Khan.

8                   I am the Debtor and Plaintiff in the above actions.

9                   I have personal knowledge of all the matters stated herein and if called  
10 to testify in a court of law, I would testify to same.

11                  I was Debtor in Bankruptcy case # 10-16183 and I am Plaintiff in this  
12 case filed against Clement et al and in another case filed against Clement et al  
13 in US District Court for the Central District of California, later removed to  
14 Federal Court Case No. CV 14-03490 FMO (CWx) entitled Agha-Khan vs. United  
15 States.

16                  I have recently became aware of a lot of fraudulent acts committed by  
17 the Defendants named in this complaint actively supported by Defendant Judge  
18 Clement and Defendant Trustee Vetter acting in collusion with other  
19 Defendants under color of official right to illegally steal my properties by force.  
20 All illegal acts alleged in this complaint were performed under the legal  
21 umbrella of "Bankruptcy Proceedings" to benefit their "special friends"  
22 Defendants Breitman, BBG Ltd, Zouras, Chandler, Grossmans and Lerer Bros.

23                  All criminal acts of Defendants were based on the foundation of an  
**ILLEGALLY REOPENED BANKRUPTCY LACKING JURISDICTION –**  
**REOPENED OVER ONE YEAR FOLLOWING DISCHARGE AND OVER TWO**  
**YEARS AFTER FILING FOR RELIEF.**

24                  The Defendants also perpetrated multiple fraudulent acts listed under  
25 several Motions describing various aspects of "Docket Fraud" perpetrated by

1 Defendants which included creation of a new docket number for hiding all  
 2 incriminating documents some of which are still hidden - TWO motions to  
 3 disqualify Defendant Judge Clement, Plaintiff's Motion to change the venue of  
 4 her Bankruptcy proceedings from Bakersfield to Los Angeles etc. These legal  
 5 thugs thus kept the main Bankruptcy docket clean.

6 More recently all Defendants in collusion have been shifting all  
 7 Bankruptcy filings in the fraudulently created "new" docket 13-01086 as this  
 8 has a Filing Date of August 1, 2013 WITHOUT LISTING OTHER BANKRUPCTY  
 DATES such as

- 9 i) Filing Date: May 30, 2010
- 10 ii) Discharge Date: September 23, 2010
- 11 iii) ILLEGAL REOPENING DATE: September 18, 2012

12 These actions provided Defendants Goldner, Holder, Cooper, Parker and  
 13 their KDG law firm the revenge he had been wanting against Plaintiff since his  
 14 in-office settlement of malpractice claim with her for their services rendered  
 while employed by her in 2006 for about **\$30,000.00**.

15 These actions also enabled Defendants Breitman, BBG Ltd, Zouras,  
 16 Chandler and behind the scene Grossmans and Lerer Bros Inc (as their  
 17 involvement was bound to be realized sooner or later) to so far walk away from  
 18 multimillion dollar settlement/judgment in San Francisco lawsuit where  
 19 precedence lawsuit had a judgment of about **\$700,000.00**.

20 These actions also afforded these criminals to perpetrate **HATE CRIMES**  
 21 **AGAINST A MINORITY COLORED WOMAN.** These felons violates her Civil  
 22 Rights, threatened her with violence on record and thus stole her properties by  
 force acting under color of official right.

23 Once discovered these criminals have been altering and hiding legal  
 24 documents under "new" case number to 'hide' their crimes from investigating  
 25 authorities only to dig a much deeper pit for them to sink into.

This Complaint is brought forth to unmask these criminals and their illegal, unethical, fraudulent actions, alliances etc carried out to defraud the Plaintiff and to support innumerable **grand theft felonies** committed by them **acting under color of official right** using "Bankruptcy" as an excuse.

The illegal reopening of Bankruptcy lacking jurisdiction by itself makes all actions etc committed under the "legal" umbrella of Bankruptcy NULL AND VOID! These actions are again NULL AND VOID when considering the innumerable frauds committed by all Defendants in collusion supported by Defendant Judge Clement.

It is hoped that all of Plaintiff's properties stolen by these criminals will be returned to her in original state immediately, sever sanctions will be imposed and damages will be awarded. Also it is hoped that exemplary punishments will be given to all Defendants named herein.

It is also the DUTY of Judicial Officers to REPORT such criminal activities and conduct for further investigation to agencies such as Criminal Division of Department of Justice so that Office of Public Integrity may prosecute these corrupt Members of Judicial Gang and remove them permanently from positions where they are able to harm unsuspecting citizens.

Executed under penalty of perjury on this day of December 29, 2014 at  
Los Angeles, California.

SALMA AGHA-KHAN, MD.  
Plaintiff-Debtor in Pro Per